

EXHIBIT 15

In the Matter Of:

In Re: Google Antitrust Litigation

BONITA STEWART

May 17, 2021



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IN RE:
GOOGLE ANTITRUST LITIGATION
60-516110-0004

HIGHLY CONFIDENTIAL
REMOTE DEPOSITION OF BONITA STEWART
MAY 17, 2021 6:00 A.M.

JOB NO. 2021-793239

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1 BONITA STEWART - HIGHLY CONFIDENTIAL

2 THE VIDEOGRAPHER: We are now
3 on the record.

4 Today's date is May 17, 2021.
5 The time right now is 6:10 a.m.
6 Eastern [sic] daylight Time.

7 This is the video deposition
8 of Bonita Stewart, In Re: Google
9 60-516110-0009.

10 This deposition is taking
11 place via web videoconference with
12 all participants attending
13 remotely due to the COVID-19
14 pandemic.

15 My name is Deane Carstensen.
16 I am the videographer representing
17 Lexitas today.

18 Would all counsel on the
19 conference please identify
20 yourselves and state whom you
21 represent beginning with the
22 questioning attorney.

23 MR. NIERLICH: Good morning.
24 This is Chip Nierlich with the
25 DOJ.

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1 BONITA STEWART - HIGHLY CONFIDENTIAL

2 opening offer.

3 So they were always ensuring
4 that I was well informed and also
5 participated -- that's why they
6 communicated when, in fact, a deal was
7 closed and usually it's a congratulatory
8 e-mail that is sent on behalf of the deal
9 team.

10 Q Many of the documents we looked
11 at earlier were e-mails.

12 Does the deal team keep you well
13 informed by e-mail or do they use other
14 methods to keep you well informed?

15 A It could be via e-mail or it
16 could be scheduled meeting. We might
17 meet about it. So it could be either or
18 both.

19 Q Do you ever get information from
20 the deal teams either telephone or by
21 chat or some other form of technology?

22 A I can't go through every single
23 deal, but I would say the majority are
24 e-mail or one-on-one, not as much
25 telephone.

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1 **BONITA STEWART - HIGHLY CONFIDENTIAL**

2 Q What about chat?

3 **A Not as much chat. It's usually**
4 **other communication forms.**

5 Q Do you recall whether you ever
6 received substantive updates by chat?

7 **A I could have received a chat**
8 **that says, hey, we closed the deal or --**
9 **you know, again, these are -- but**
10 **anything that required greater**
11 **communication. And in this case well**
12 **informed, I would say it would be on the**
13 **e-mail or meeting one-on-one or through**
14 **the GPx process.**

15 Q Have you reviewed your chat
16 messages -- and by chat I mean Google
17 Meet or Hangouts or any other form of
18 business chat -- to determine whether
19 there are, in fact, any substantive
20 discussions related to your work
21 contained within those?

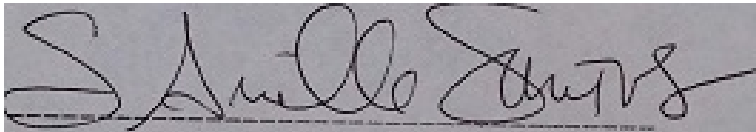
22 **A I haven't -- no, I have not**
23 **reviewed my chat history.**

24 Q If you can go to the last bullet
25 on the page ending in 555 starts with

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1 I, S. Arielle Santos, Certified
2 Shorthand Reporter, Certified LiveNote
3 Reporter do hereby certify:
4 That prior to being examined, the witness
5 named in the forgoing deposition, was by
6 me duly sworn to testify the truth, the
7 whole truth, and nothing but the truth.
8 That said deposition was taken before me
9 at the time and place set forth and was
10 taken down by me in shorthand and
11 thereafter reduced to computerized
12 transcription under my direction and
13 supervision, and I hereby certify the
14 foregoing deposition is a full, true and
15 correct transcript of my shorthand notes
16 so taken.
17 I further certify that I am neither
18 counsel for nor related to any party to
19 said action nor in anywise interested in
20 the outcome thereof.

21 

22 S. Arielle Santos, CCR, CLR
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